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10 *KVP, LP and KRM, INC. dba*

THOMAS KELLER RESTAURANT GROUP

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 U.S. EQUAL EMPLOYMENT OPPORTUNITY
14 COMMISSION,

15 Plaintiff,

16 vs.

17 KVP, LP dba BOUCHON RESTAURANT;
18 KRM, INC. dba THOMAS KELLER
RESTAURANT GROUP; DOES 1-10, inclusive;

19 Defendants.

Case No.: 2:23-CV-01308-JCM-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
KVP, LP AND KRM, INC. TO FILE
OPPOSITION TO MOTION TO
COMPEL**

(Second Request)

21 Pursuant to LR 7-1 and LR IA 6-1, Defendants KVP, LP dba Bouchon Restaurant
22 (“Bouchon”) and KRM, Inc. dba Thomas Keller Restaurant Group (“KRM”) (collectively
23 “Defendants”), by and through their attorneys, Michael D. Bruno, Esq., Michael A. Laurenson,
24 Esq. and Dione C. Wrenn, Esq. of the law firm of Gordon Rees Scully Mansukhani LLP and
25 Plaintiff U.S. Equal Employment Opportunity Commission (“EEOC”) by and through its
26 attorneys hereby stipulate and agree as follows:

27 1. EEOC filed a Motion to Compel Defendants’ Further Responses pursuant to
28 Local Rule 26-6 (“Motion to Compel”) on November 19, 2024 [ECF No. 33].

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2. Defendants' Opposition to Motion to Compel was originally due on December 3, 2024.

3. Defendants requested additional time to file their Opposition on December 10, 2024.

4. Defendants now request three (3) additional days to file their Opposition. The new deadline will be December 13, 2024.

5. EEOC does not oppose Defendants' requested extension.

6. Accordingly, Defendants will file their Opposition to Motion to Compel on December 13, 2024.

7. This request for extension is made in good faith and is not sought for any improper purpose or delay.

IT IS SO STIPULATED.

DATED this 10th day of December 2024.

**GORDON REES SCULLY
MANSUKHANI**

/s/ Dione C. Wrenn

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**THOMAS KELLER RESTAURANT
GROUP**

DATED this 10th day of December 2024.

**U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION**

/s/ Dayana R. Pelayo

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Attorneys for Plaintiff,

**U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION**

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: December 10, 2024